

FEB 2 1990

MEMORANDUM

SUBJECT: Wood Preservative Team Meeting - Request for
Modification of the Consumer Information Sheet

FROM: Spencer L. Duffy, ^{SLD} Review Manager
Special Review Branch

TO: Addressees

Selected members of the wood preservative team will meet on Thursday, February 8th, at 1:30 P.M. in room 300 CM #2.

The purpose of this meeting is to discuss and decide on the appropriate response to Hickerson's (via Kilpatrick & Cody) request to allow wood treated with chromated copper arsenate (CCA) to be used in the construction of water troughs silage and feed bunkers for domestic animals.

Hickerson's request is based on data submitted by the company which showed levels of chromium copper and arsenic below the health level of concern for FDA. In addition, Hickerson contends that language in the PD 4 supports food contact use for CCA treated wood. (See attachment to Kilpatrick's December 15th letter)

The issues that we must resolve are: what is EPA's role in this matter, how will EPA reconcile the atypical approval, by FDA, of an apparent prohibited use and whether indeed such a use should be allowed?

I have enclosed letters from Kilpatrick on behalf of Hickerson, reviews of the data submitted, FDA's letter approving the use of CCA for construction of watering troughs, silage and feed bunkers, OGC's response to Hickerson's request and a copy of the consumer information sheet for the Inorganic Arsenicals.

Please review the enclosed material and come prepared to express your views.

If you have questions, please call me at 557-1529.

Enclosures

Addressees:

Cara Jablon
David Stangel
Larry Anderson
Francis Suhre
Sidney Jackson

Wood Preservative Meeting - Modification
of the Consumer Information Sheet

February 8, 1990

Agenda

	<u>Time</u>
I. Sign in	1:30
II. Introductory remarks - RM	1:33
III. Discussion of Hickerson's request	1:35
A. Data considerations	
B. Regulatory considerations - PD 4 (pp 117+118) CAP	
C. Jurisdictional considerations - EPA FDA	
D. Tolerance considerations	
E. Legal considerations	
F. Impact on other products of CCA	
G. Public concerns about wood preservatives and Arsenic	
H. Other considerations	
IV. Options	2:08
V. Team consensus on best options	2:18
VI. Summary	2:25
VII. Closing remarks	2:28
VIII. Adjournment	2:30